

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF OREGON
PORTLAND DIVISION

PATSY JAY,

Plaintiff,

vs.

Case No. 3:23-cv-656

GRAND MANAGEMENT SERVICES, INC., EVERGREEN GARDENS
LIMITED PARTNERSHIP JERRY MASCOLO, LEONDRA COLEMAN,
and DAWN COCKRUM,

Defendants.

DEPOSITION OF
LEONDRA COLEMAN

TAKEN ON
FRIDAY, JULY 19, 2024
8:57 A.M.

WILLIAMS KASTNER
1515 SOUTHWEST FIFTH AVENUE, SUITE 600
PORTLAND, OREGON 97201

LEONDRA COLEMAN
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2 to 5

	Page 2		Page 4
1	APPEARANCES		
2			
3	Appearing on behalf of the Plaintiff:		
4	EDWARD JOHNSON, ESQUIRE		
5	Oregon Law Center		
6	522 Southwest 5th Avenue, Suite 812		
7	Portland, Oregon 97204		
8	(800) 672-4919		
9	(503) 295-0676 (Fax)		
10	ejohnson@oregonlawcenter.org		
11	-and-		
12	CARLY CRIPPS, ESQUIRE		
13	Oregon Law Center		
14	230 Northeast 2nd Avenue, Suite F		
15	Hillsboro, Oregon 97124		
16	(503) 726-4381		
17	(503) 726-4382 (Fax)		
18	ccripps@oregonlawcenter.org		
19			
20			
21			
22			
23			
24			
25			
	Page 3		Page 5
1	APPEARANCES CONTINUED		
2			
3	Appearing on behalf of Grand Management Services,		
4	Inc., Jerry Mascolo, Leondra Coleman, and Dawn		
5	Cockrum:		
6	HEIDI L. MANDT, ESQUIRE		
7	Williams Kastner		
8	1515 Southwest 5th Avenue, Suite 600		
9	Portland, Oregon 97201		
10	(503) 228-7967		
11	(503) 222-7261 (Fax)		
12	hmandt@williamskastner.com		
13			
14	Appearing on behalf of Evergreen Gardens Limited		
15	Partnership:		
16	NATHAN MCCLINTOCK, ESQUIRE		
17	Corrigall & McClintock, LLP		
18	936 Central Avenue		
19	Coos Bay, Oregon 97420		
20	(541) 269-1123		
21	nmcclintock@epuerto.com		
22			
23			
24			
25			
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14 to 17

<p style="text-align: right;">Page 14</p> <p>1 Q. And was it like a video thing that you 2 could do online or?</p> <p>3 A. Yes, it was online. But yes, there were 4 videos, but it was a lot of questions, 5 questionnaires, reading up on things, answering the 6 questions afterwards. But there were a lot of 7 videos. Yes.</p> <p>8 Q. And do you remember if this course covered 9 the topic of sexual harassment?</p> <p>10 A. Yes.</p> <p>11 Q. And what do you remember about your 12 training on sexual harassment?</p> <p>13 A. Well, honestly, it's been a while, but for 14 the sexual harassment specifically, a lot of it is 15 reporting to supervisors, documentation, and 16 specific like abusers wouldn't be able to be in 17 contact with a victim if there was an ongoing like 18 criminal investigation. But other than that, from 19 my standpoint, there wasn't much for me to do.</p> <p>20 Q. Okay. Any -- do you recall anything else 21 about what you learned about sexual harassment in 22 those trainings?</p> <p>23 A. Currently, no.</p> <p>24 Q. Okay.</p> <p>25 A. No.</p>	<p style="text-align: right;">Page 16</p> <p>1 Q. Which -- and which were those?</p> <p>2 A. Evergreen and Golden Eagle.</p> <p>3 Q. Okay. And did they have the same kind of 4 federal subsidy?</p> <p>5 A. They both, yes, they did.</p> <p>6 Q. Okay.</p> <p>7 A. Uh-huh.</p> <p>8 Q. And do you remember what that was?</p> <p>9 A. No. It was just like the Rural 10 Development funding. Yeah. I don't know specific. 11 There were two different kinds.</p> <p>12 Q. And that's through the Department of 13 Agriculture?</p> <p>14 A. Yes, exactly.</p> <p>15 Q. Okay. And do you recall if there were any 16 rules around those RD properties that limited your 17 ability to evict tenants?</p> <p>18 A. Yes. Yeah.</p> <p>19 Q. What -- what do you remember about that?</p> <p>20 A. Well, I mean, it doesn't necessarily 21 prevent me from evicting them. They all still have 22 the same guidelines, so I guess the answer would be 23 no. No, there isn't anything specific from the RD 24 to the regular renting tenants that they get special 25 rules or something.</p>
<p style="text-align: right;">Page 15</p> <p>1 Q. When you're -- what -- what was your job 2 at GMS?</p> <p>3 A. I was property -- well, I was like on site 4 manager. So basically, I was the manager that lived 5 on the property. Helped manage the grounds, I 6 guess, like upkeep the grounds. And then I had my 7 office portion of the job, which was recertification 8 for all the tenants, filing complaints, maintenance 9 work orders every day. Yeah.</p> <p>10 Q. Okay. So you -- you were doing 11 recertification because there was some kind of 12 federal subsidy in these projects?</p> <p>13 A. Yes. That was attached to the -- to the 14 job I had. Yes.</p> <p>15 Q. Okay.</p> <p>16 A. Yeah.</p> <p>17 Q. And did -- how many projects did you 18 manage when you were at GMS?</p> <p>19 A. How many projects?</p> <p>20 Q. I mean how many --</p> <p>21 A. The properties?</p> <p>22 Q. -- properties? Yeah.</p> <p>23 A. Yeah. Two.</p> <p>24 Q. Okay.</p> <p>25 A. Two properties.</p>	<p style="text-align: right;">Page 17</p> <p>1 No, that doesn't pertain to evictions 2 unless, like they lie or something on their 3 applications for their rental amount because they do 4 have to do a packet. I mean, if they falsify 5 something on that, then eventually they could get 6 evicted. Yes.</p> <p>7 Q. Okay. So let me unpack that a little bit. 8 So I -- I gather what you're saying is that like if 9 somebody lies about their income, they could be 10 evicted for that?</p> <p>11 A. Yes. Exactly, which the people that don't 12 have income required. Well, I guess certainly they 13 still do. No, they all follow the same rules.</p> <p>14 Q. Okay. And -- but to the extent, you know, 15 is it -- was there anything about these rural 16 development regulations that limited the kinds of 17 evictions you could give someone compared to just 18 market rate landlord tenant law?</p> <p>19 MS. MANDT: Object to form.</p> <p>20 THE DEPONENT: Yes. You might have to 21 reword that one more time.</p> <p>22 BY MR. JOHNSON:</p> <p>23 Q. That's probably a terrible question.</p> <p>24 A. That's a long question.</p> <p>25 Q. Yeah.</p>

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<p style="text-align: right;">Page 26</p> <p>1 Properties, tillamookproperties@gmail.com.</p> <p>2 Q. Okay. And did you just have one at a</p> <p>3 time?</p> <p>4 A. When I first started, it was the</p> <p>5 goldeneagle2 and evergreengardens. They had their</p> <p>6 own emails separate.</p> <p>7 Q. Okay.</p> <p>8 A. And then we merged those two together,</p> <p>9 which was tillamookproperties and it was just</p> <p>10 tillamookproperties for the remainder of my</p> <p>11 employment.</p> <p>12 Q. Okay. Do you still have those emails?</p> <p>13 A. No. No.</p> <p>14 Q. You haven't had access to that since,</p> <p>15 right?</p> <p>16 A. I don't have access to them. They may --</p> <p>17 might still exist, yes.</p> <p>18 Q. Okay.</p> <p>19 THE REPORTER: Just wait for him to finish</p> <p>20 his question before you answer.</p> <p>21 THE DEPONENT: Okay.</p> <p>22 MR. JOHNSON: Yeah.</p> <p>23 THE REPORTER: Thank you.</p> <p>24 BY MR. JOHNSON:</p> <p>25 Q. Sorry.</p>	<p style="text-align: right;">Page 28</p> <p>1 MR. JOHNSON: Well, I don't really know</p> <p>2 what it means.</p> <p>3 BY MR. JOHNSON:</p> <p>4 Q. So did -- like when you -- when you were</p> <p>5 onboarded, when you started, did somebody like sit</p> <p>6 down with you and talk to you about ongoing issues</p> <p>7 at the property?</p> <p>8 MS. MANDT: Object to form.</p> <p>9 THE DEPONENT: I can still answer that?</p> <p>10 MS. MANDT: Yeah, you can.</p> <p>11 THE DEPONENT: Yes. Yes.</p> <p>12 BY MR. JOHNSON:</p> <p>13 Q. And do you remember who that was?</p> <p>14 A. My supervisors, Jerry and Maria.</p> <p>15 Q. Okay. And did they tell you about like</p> <p>16 any ongoing disputes between tenants?</p> <p>17 A. No, because there weren't any ongoing</p> <p>18 disputes.</p> <p>19 Q. Okay. Did they tell you about any</p> <p>20 previous complaints that tenants had made about one</p> <p>21 another before you started?</p> <p>22 MS. MANDT: Object to form.</p> <p>23 THE DEPONENT: No.</p> <p>24 BY MR. JOHNSON:</p> <p>25 Q. Did anyone inform you when you started</p>
<p style="text-align: right;">Page 27</p> <p>1 A. No, it's okay. You're good.</p> <p>2 Q. My -- my bad too.</p> <p>3 A. You don't need to apologize.</p> <p>4 Q. I mean, it's how normal people talk, but</p> <p>5 --</p> <p>6 A. It's okay. You're fine.</p> <p>7 Q. -- Court Reporter.</p> <p>8 When you started -- do you remember when</p> <p>9 you started at GMS?</p> <p>10 A. When I started employment? No, not</p> <p>11 really.</p> <p>12 Q. Is it --</p> <p>13 A. I know the season. It's the wildfire</p> <p>14 season because that's --</p> <p>15 Q. Yeah. Was it possibly September 15th,</p> <p>16 2020? Like I saw that somewhere.</p> <p>17 A. Actually, yeah. Give or take around</p> <p>18 there. Yeah.</p> <p>19 Q. And you were there for just over a year?</p> <p>20 A. Yeah, a little bit over a year.</p> <p>21 Q. Okay. When you started at GMS, did anyone</p> <p>22 provide you with information about like, what was</p> <p>23 going on at the properties?</p> <p>24 MS. MANDT: Object to form. What was</p> <p>25 going on at the properties? What does that mean?</p>	<p style="text-align: right;">Page 29</p> <p>1 that a couple of women had gotten restraining orders</p> <p>2 against John McKnight?</p> <p>3 A. No.</p> <p>4 Q. Did anyone inform you that John McKnight</p> <p>5 had been accused of sexual assault by someone who</p> <p>6 had your job before you?</p> <p>7 A. No.</p> <p>8 Q. Did Jerry or Dawn say anything about Patsy</p> <p>9 Jay when you started?</p> <p>10 A. No. No.</p> <p>11 Q. Okay.</p> <p>12 A. No.</p> <p>13 Q. I -- I just --</p> <p>14 A. No.</p> <p>15 Q. So when you were working at Grand</p> <p>16 Management, was John McKnight an employee there?</p> <p>17 A. No.</p> <p>18 Q. Okay. Do you know if he was ever an</p> <p>19 employee?</p> <p>20 A. Yes. He was like maintenance.</p> <p>21 Q. Do you remember when that ended?</p> <p>22 A. Probably like -- I don't know. No, I</p> <p>23 don't know.</p> <p>24 MS. MANDT: Don't guess if you don't know.</p> <p>25 THE DEPONENT: Yeah. I don't know.</p>

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<p>1 office hours or if I have to go to another apartment 2 complex, it'll be filed the next morning.</p> <p>3 Q. Okay. 4 A. Yes. 5 Q. And like, what kind of incidents warrant 6 an incident report? 7 A. What kind? Any incident, and especially 8 incidents that revolve like the police and stuff. 9 Like, well, I wouldn't say any incident. I mean, it 10 tells you right here, type of incident injury, 11 property damage, police. I mean there isn't other. 12 So I mean, I guess it would be anything very 13 important.</p> <p>14 Q. Okay. So you wrote on -- in here, "No 15 injury sustained." Do you mean no physical injury? 16 A. Yes. Yes. 17 Q. Okay. What do you remember about Ruth 18 Fulks, if -- if anything? 19 A. She's just another tenant. 20 Q. Okay. So she lived on the property? 21 A. Yes. Uh-huh. 22 Q. All right. Was she with Patsy Jay when 23 Patsy came to you to talk -- to tell you about this? 24 A. No. She was not with me. No. Patsy came 25 to talk to me about this a few days later after I</p>	<p>Page 38</p> <p>1 tenants. 2 Q. Yeah. 3 A. So I have to go in description on why -- 4 Q. Okay. 5 A. -- that happened. 6 Q. So you were having an interaction with the 7 police about that and this is what this is? 8 A. Yes. 9 Q. Okay. 10 A. Uh-huh. 11 Q. All right. That makes more sense now. I 12 had a bunch of questions that you just answered. 13 Thank you. 14 A. Yeah, no worries. 15 Q. Do you remember when you talked with -- 16 was it Officer Saddler? Does that ring a bell? 17 A. Yes. 18 Q. Do you remember when that was? Was it on 19 the 12th? 20 A. It was on Sunday, the 11th. 21 Q. Yeah. 22 A. The date that's first on the incident 23 report. 24 Q. And where was that conversation? 25 A. At the apartment complex at my front door.</p>
<p>Page 39</p> <p>1 had called her and asked her to come to my office to 2 talk about it.</p> <p>3 Q. Okay. 4 A. This is when the police came to my door. 5 That's when they notified me that this happened.</p> <p>6 Q. Oh, okay. I understand. So it says, 7 "Reported by Ruth Fulks and Patsy Jay." But you -- 8 you filled this out after --</p> <p>9 A. That's -- this is reported to the police. 10 Q. Let me -- I'm sorry, let me back up and 11 finish that question. So you -- you filled out this 12 report based on your conversation with the police? 13 A. Yes. That's what the incident report is 14 for. 15 Q. Okay. I just didn't understand because I 16 thought --</p> <p>17 A. Yeah. 18 Q. It says up top, "Reported by Ruth Fulks 19 and Patsy Jay." So I thought you were talking to 20 them about this.</p> <p>21 A. Oh, no. This is my altercation with the 22 police involving the tenants. 23 Q. Yeah. 24 A. That's why the incident report is made 25 because there was a police altercation involving my</p>	<p>Page 41</p> <p>1 Q. Okay. 2 A. Yeah. Well, actually inside my unit. 3 Q. Okay. And after you talked to Officer 4 Saddler, did you talk to other residents about this 5 incident? 6 A. I talked to Patsy and I talked to John 7 McKnight and I talked to Ruth Fulks about it, yes. 8 Q. Okay. 9 A. The people that are on the incident 10 report. 11 Q. Did you talk to Carolyn Degon? 12 A. No, I did not talk to Carolyn Degon about 13 this. That would -- 14 Q. Did you talk to Shirley Rose? 15 A. No. 16 Q. Do you remember Officer Saddler telling 17 you that other women had been -- had made 18 allegations about John McKnight? 19 A. That's -- 20 MS. MANDT: Object to form. 21 THE DEPONENT: Yeah. Could you actually 22 reword that one more time? Sorry. 23 BY MR. JOHNSON: 24 Q. Well, I'm just looking at page -- the 25 first page of this exhibit. It says, "John began to</p>

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1 brag about how he manipulates the other women in the
 2 complex." And then in parentheses, "Carolyn Degon,
 3 Shirley Rose."

4 A. Yes. This is me repeating what they're
 5 telling me. So when it says, "John began to brag,"
 6 that's somebody telling me that John began to brag.
 7 I'm just repeating what was said.

8 Q. By Officer Saddler?

9 A. Yes. That's him repeating what he was
 10 told by Patsy and Ruth.

11 Q. Okay.

12 A. That there's no one actually -- there's no
 13 one actually saying that they saw him do that, other
 14 than Patsy and Ruth.

15 Q. Okay.

16 A. So they're just repeating to the police
 17 officer and he's repeating to me.

18 Q. Got it. So after you learned this, you
 19 did not follow up with Carolyn Degon or Shirley
 20 Rose?

21 A. No.

22 Q. Okay. Did you ever get complaints from
 23 Carolyn Degon or Shirley Rose about John McKnight?

24 A. Carolyn Degon, yes. But not Shirley Rose.

25 Q. Is she the person that you were referring

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1 to in 7A or is that a different person?

2 A. Actually, it is Carolyn Degon now I think
 3 about it. Yes, it is her.

4 Q. Okay.

5 A. And she does not live in 7A. She lives in
 6 7C.

7 Q. Okay. What did you do after you got this
 8 report from Officer Saddler?

9 A. Oh, I reported instantly to my -- my
 10 supervisors.

11 Q. And your -- was Maria your supervisor at
 12 that time?

13 A. It was Maria and Jerry.

14 Q. Okay.

15 A. They were like co-supervisors together.
 16 Yeah.

17 Q. Do you remember how you reported it to
 18 them?

19 A. Through my office, landline phone I
 20 called.

21 Q. Okay.

22 A. And faxed this in.

23 Q. Okay. So on the second page of that
 24 exhibit -- let's see here. On the second page of
 25 this exhibit, it says, "Management went to Patsy's

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1 unit to rekey her front door." Was that -- why was
 2 that?

3 A. Because Patsy requested, and Grand
 4 Management thought it was appropriate to have her
 5 front door rekeyed because -- because John had a key
 6 to her unit is what Patsy had said.

7 Q. Okay. And do you know how he got a key to
 8 her unit?

9 A. He gave -- she gave him a key.

10 Q. Because he walked her dog?

11 A. Yes.

12 Q. Okay.

13 A. I'm pretty sure John dog sitted (sic) for
 14 her, not just watched her -- like, not just walk the
 15 dog, but dog sitted.

16 Q. When she was gone?

17 A. Yes.

18 Q. Okay. Did you have any conversations with
 19 Maria Mant?

20 A. Is that her name?

21 A. Maria Moldt.

22 Q. Moldt?

23 A. Yeah. Sorry.

24 Q. The name was familiar.

25 A. Yeah.

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1 Q. Did you have any conversations with Maria
 2 Moldt or Jerry Mascolo about what to do in response
 3 to this incident?

4 A. Yes. Yes, I did.

5 Q. What do you remember about those?

6 A. The conversations we were had was just to
 7 communicate as clear as possible with Grand
 8 Management to notify them what was going on, filing
 9 everything that they can, rekey Patsy's unit, and
 10 that they weren't able to do anything. And specific
 11 was that we were not able to move forward with any
 12 sort of process with John without some type of
 13 police report or like charges being pressed against
 14 John.

15 Q. Okay.

16 A. Like, some type of order, safety order
 17 something.

18 Q. And who -- who was -- who was making that
 19 decision?

20 A. Jerry is the one that specifically told me
 21 that.

22 Q. Did -- did Jerry, as part of this
 23 conversation, mention that other women had gotten
 24 restraining orders against John McKnight in the
 25 past?

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<p style="text-align: right;">Page 46</p> <p>1 MS. MANDT: Asked and answered. 2 THE DEPONENT: I answered. 3 BY MR. JOHNSON: 4 Q. Well, I think what I asked before was that 5 when you started at the job -- 6 A. Uh-huh. 7 Q. -- did anybody tell you that. And you 8 said no. But when this happened in July of 2021, 9 did anyone mention that other women had gotten 10 restraining orders against John McKnight? 11 A. I had already known by then. 12 Q. Okay. How did you find that out? 13 A. Me going through my tenants' files. 14 Q. Okay. 15 A. Yes. 16 Q. Like AppFolio? 17 A. Yes. And just their paper files as well. 18 Q. Okay. So when this -- when you had this 19 conversation with Maria Moldt and Jerry Mascolo, did 20 it -- did it factor into what you did the fact that 21 this -- that there had been multiple women who had 22 accused John McKnight of sexual harassment? 23 A. No. No. They're all separate. No. I -- 24 I can't mix things, no. 25 Q. Did anybody talk about giving him a 24-</p>	<p style="text-align: right;">Page 48</p> <p>1 A. Yes. I guess they -- 2 Q. Was there anything other than neighbors 3 that comes to mind? 4 A. Friends. 5 Q. Yeah. 6 A. Or acquaintances, I guess. 7 Q. Do you know if they were in a romantic 8 relationship? 9 A. No. 10 Q. You don't know? 11 A. I don't know if anyone -- yeah. 12 Q. Okay. I think that was asked and 13 answered. How did you learn that Deborah Greaves 14 had information about this incident? 15 A. She came to me about it. She came to me 16 letting me know that Patsy had told her, or confided 17 in her that this was all a hox. That she made it up 18 to get back at John for not wanting to be in a 19 romantic relationship with Patsy. That's how I know 20 that Deborah knows something. 21 Q. Okay. And do you know if Deborah Greaves 22 had spoken to John McKnight about this incident 23 before? 24 A. Yes, I do know that. 25 Q. What do you remember about that?</p>
<p style="text-align: right;">Page 47</p> <p>1 hour notice? 2 A. Yes. 3 Q. Who -- do you remember what was said about 4 that? 5 A. We talked about giving him a notice 6 depending if everything worked out. Like if we got 7 the paperwork and things followed through -- 8 Q. A 24-hour notice? 9 A. -- and Patsy followed through. And 10 specific not a 24-hour notice unless the paperwork. 11 So I would have to have like -- I don't know, like a 12 police report saying that there's proof or 13 something, and I cannot give that. My supervisor 14 has to do it. 15 Q. Okay. Did he get any eviction notice as a 16 result of this incident report? 17 A. He got a 14/30, which is like a repair 18 notice. So he -- 19 Q. Do you remember -- do you remember when 20 that was? 21 A. I don't know the date. No, sir. 22 Q. Okay. Do you remember Deborah Greaves? 23 A. Yes. 24 Q. Do you know anything about her 25 relationship with John McKnight?</p>	<p style="text-align: right;">Page 49</p> <p>1 A. Debbie told me that she talked with John. 2 She told me that she felt for him because she knew 3 how Patsy could get and that she didn't think it was 4 right what Patsy was doing. 5 Q. Okay. And did you record this 6 conversation with Deborah Greaves? 7 A. I did record a -- yes, I did. Not this 8 whole conversation, but a portion of it, yes. 9 Q. Okay. And did you record any other 10 conversations? 11 A. No. That's the only conversation I've 12 ever recorded. 13 Q. How come you recorded that one and not 14 like others when you were talking to people about 15 this? 16 A. Because this pertained to like a legal 17 issue. This was after the police report and stuff 18 had already been made, and I wanted to be safe. 19 Q. Okay. And did you relay this -- the 20 substance of this conversation to Officer Saddler? 21 A. Yes. 22 Q. And did you relay any other conversations 23 that you'd had with Patsy or John or anybody else to 24 Officer Saddler or -- 25 A. Yes.</p>

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1 letter from, or this complaint from Mr. McKnight, 2 did you issue an eviction notice to Ms. Jay? 3 A. Sorry, what was the question again? 4 Q. Shortly after you got the August 14th, 5 2021 complaint from Mr. McKnight -- 6 A. Uh-huh. 7 Q. -- did you issue an eviction notice to Ms. 8 Jay? 9 MS. MANDT: Object to form. 10 THE DEPONENT: She got probably a 14/30, 11 not an eviction notice. 12 BY MR. JOHNSON: 13 Q. So why are you saying that's not an 14 eviction notice? 15 A. Well, because a 14/30 -- eviction notice 16 is like a notice stating that you are evicted and 17 you have to vacate between this timeframe. And a 18 14/30 is a -- a notice to fix the problem. Your 19 attempt to not get evicted. If you don't fix the 20 problem, or I guess you'd say the problem keeps 21 happening, then you will get evicted and you'll have 22 a whole different notice and everything before the 23 eviction is actually there or done. 24 Q. Okay. What do you remember about the 25 reason for that 14/30 notice that you gave Ms. Jay?	1 that? 2 A. About the -- 3 Q. About the -- 4 A. -- the letter? 5 Q. The 14/30 notice. Yeah. 6 A. She ended up fixing all the things, so 7 that's what I remember. 8 Q. Okay. 9 A. All the requirements. 10 MR. JOHNSON: We at 19? 11 (WHEREUPON, Exhibit 19 was marked for 12 identification.) 13 THE REPORTER: Correct. 14 MR. JOHNSON: Oh, sorry. 15 THE REPORTER: No problem. 16 MR. JOHNSON: You get paper cuts a lot? 17 THE REPORTER: Actually, no. 18 BY MR. JOHNSON: 19 Q. I'm going to show you an exhibit that's 20 been marked Number 19. 21 A. Okay. 22 Q. Is this the document that you were 23 referring to as the 14/30? 24 A. No. The 14/30 states it's a 14/30. 25 Q. Do you recognize this document?
Page 67	Page 69
1 A. The reason -- 2 MS. MANDT: Well, I'm going to object to 3 form because it misstates her testimony. She said 4 probably. She did not say she did. 5 THE DEPONENT: What was the question 6 again? 7 BY MR. JOHNSON: 8 Q. So, do you remember if you ever gave Ms. 9 Jay a 14/30 notice? 10 A. Yes. 11 Q. And do you remember what the reason for 12 that notice was? 13 A. Multiple reasons. But one of the reasons 14 was that she didn't stop watching John through the 15 window with binoculars. 16 Q. Okay. What are -- what do you recall 17 about the other reasons for giving that notice? 18 A. Well, the other reasons would have been 19 her also not following through with her commitment 20 to keep her front patio up to the lease standards. 21 And then there would have also been sending letters 22 to the other -- the other tenants, the -- the 23 disturbing of other tenant's peace regarding the 24 situation. 25 Q. Okay. Do you remember anything else about	1 A. Yes. I do know this. 2 Q. What is this? 3 A. This is the intent to evict notice. This 4 is what you get after you get a 14/30 when the 5 problems have continued, the problems that are 6 listed on your 14/30. 7 Q. So this is an eviction notice? 8 A. No. There will be one more before this 9 that actually states the eviction has been put in 10 process. 11 Q. Okay. So -- but this document is called 12 Notice of Intent to Evict? 13 A. Yes. This means that if you don't follow 14 through with actually fixing the cures here on the 15 -- the second to last page, that the eviction will 16 be put in, like to the courthouse. 17 Q. So Ms. Jay got some -- a 14/30 notice 18 prior to getting this? 19 A. Yes. Yes. 20 Q. Okay. Did you issue this -- 21 A. No. 22 Q. -- this notice to Ms. Jay? 23 A. Yes. 24 Q. Did you write it? 25 A. Me and Don.

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70 to 73

	Page 70	Page 72
1 Q. So you consulted with Dawn Cockrum about		<u>1 front porch?</u>
2 this?		2 A. She kept it on her front porch because she
3 A. Yes. Dawn Cockrum. Yes. Yes.		3 didn't have space in her unit for it.
4 Q. <u>Anyone else?</u>		4 Q. <u>Okay. And did she need it to get around</u>
5 A. Jerry Mascolo would have also been in on		<u>5 as a walker?</u>
6 this as well, like consulted.		6 A. I couldn't tell you that. I don't know
7 Q. <u>Okay.</u>		7 her physical condition.
8 A. Yeah. For verbiage.		8 Q. <u>Okay.</u>
9 Q. <u>And do you remember if there was a</u>		9 A. But no.
10 particular person who made the decision to issue		10 Q. <u>What do you mean?</u>
11 this notice?		11 A. I would assume not, no.
12 A. In specific, it would have been Dawn and		12 Q. <u>You would assume she didn't need it?</u>
13 Jerry. That's a joint decision. Yeah.		13 A. No.
14 Q. <u>Were you aware at the time that</u>		14 Q. <u>Okay.</u>
15 this notice was issued that Ms. Jay is a person with		15 A. Or that she couldn't use it because it's a
16 disabilities?		16 walker and she was in a motorized chair.
17 A. Wait, ask -- sorry, what was that again?		17 Q. <u>Oh.</u>
18 Q. <u>Were you aware at the time that this</u>		18 A. And had complained to me various times
19 notice was issued that Ms. Jay was a person with		19 that she could not use her legs.
20 disabilities?		20 Q. <u>Okay. So you never saw her using a</u>
21 A. Yes.		<u>21 walker?</u>
22 Q. <u>How did you know that?</u>		22 A. I've never seen her walk before.
23 A. Because she was my tenant and I could see		23 Q. <u>Okay. But it was her walker?</u>
24 that she was in a wheelchair.		24 A. Yes. I would assume so. And she said so.
25 Q. <u>Okay. At the bottom of page 281, which I</u>		25 Yes, it's her walker.
	Page 71	
1 guess is the third page of this, there's a		Page 73
2 description of May 13, 2021, management posted a		1 Q. <u>Okay.</u>
3 notice. Is that the 14/30 that you were referring		2 A. Yeah.
4 to?		3 Q. <u>So I'm going to walk through some of these</u>
5 A. No. No. That would just be a regular --		<u>4 dated incidents. So the next one is July 30th,</u>
6 that would just be like a regular notice. It would		<u>5 2021. Do you see that?</u>
7 not be called a 14/30. That's just me letting you		6 A. Okay. Yeah.
8 know that there's a problem you have to fix. That		7 Q. <u>Do you remember -- so do you remember this</u>
9 hasn't even gone down to the -- the three strikes		<u>8 incident?</u>
10 rule kind of thing.		9 A. Yes. I do remember -- I remember Patsy
11 Q. <u>So this notice that you're referring to on</u>		10 coming to me regarding this incident. Yes.
12 May 13th was not any kind of eviction notice? It		11 Q. <u>So you weren't there?</u>
13 was just like a here's the rules, you're breaking		12 A. I was not there, no.
14 them?		13 Q. <u>Okay. And did you write the part that's</u>
15 A. Yes, exactly. Yes.		<u>14 bold and underlined -- underlined there?</u>
16 Q. <u>Okay. Like a warning?</u>		15 A. I did not specifically write that, no.
17 A. Yes. Exactly, a warning.		16 Q. <u>Do you know who did?</u>
18 Q. <u>Okay. Do you remember what she had on her</u>		17 A. Yes. Dawn.
19 front porch back in May?		18 Q. <u>Okay. So did you know at this time that</u>
20 A. Yeah. That would have been the chair.		<u>19 Patsy Jay had a restraining order that said Mr.</u>
21 The -- it's like a push chair. It's not a		<u>20 McKnight had to stay 500 feet away from her?</u>
22 wheelchair, but you push it while you walk.		21 A. I did know that, yes.
23 Q. <u>Okay.</u>		22 Q. <u>Okay. Was it your understanding that she</u>
24 A. Like assisted chair, you would call.		<u>23 also had to stay 500 feet away from him pursuant to</u>
25 Q. <u>Did she tell you why she kept it on her</u>		<u>24 this order?</u>

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74 to 77

Page 74	
1	<u>Q. So she could violate the order if she came</u>
2	<u>within 500 feet of him?</u>
3	A. Yes. Yes.
4	<u>Q. Okay. Did you tell Ms. Jay that she</u>
5	<u>needed to stay out of the community room if Mr.</u>
6	<u>McKnight was in there?</u>
7	A. I personally did not state that. The
8	order did right here.
9	<u>Q. Okay.</u>
10	A. Yeah.
11	<u>Q. At the top of the next page, there's an</u>
12	<u>incident from August 11th, 2021 involving Ms. Jay's</u>
13	<u>caretaker. Do you remember that?</u>
14	A. Oh, yes. I remember that. Yeah.
15	<u>Q. What do you recall about that incident?</u>
16	A. I -- I think her name was Rebecca.
17	Patsy's caretaker, came to my office. She was
18	banging on the door. I let her in. She was just
19	really mean, yelling at me, calling me names, saying
20	I wasn't doing my job. And that the process wasn't
21	moving fast enough for Patsy to feel safe.
22	<u>Q. And did you write this part of the</u>
23	<u>eviction notice?</u>
24	A. Which part?
25	<u>Q. Just the entry under August 11th, 2021.</u>

Page 75	
1	A. The entire thing? Between me and Dawn, it
2	was both of us.
3	<u>Q. Okay. But the only people that were</u>
4	<u>present for this were you and -- I'm sorry, what was</u>
5	<u>the caregiver's name?</u>
6	A. Rebecca.
7	<u>Q. Rebecca. Is that right?</u>
8	A. Yes.
9	<u>Q. Okay.</u>
10	A. Were just, me and Rebecca were together
11	for this. Yeah.
12	<u>Q. Okay. And it -- so did Rebecca say to you</u>
13	<u>that you were not following up on John's daily</u>
14	<u>harassment?</u>
15	A. She said that to me.
16	<u>Q. Okay.</u>
17	A. Yes.
18	<u>Q. Okay. And prior to this, were you aware</u>
19	<u>that Patsy Jay was saying that John was harassing</u>
20	<u>her every day?</u>
21	A. Yes, but I told Patsy that she -- she
22	knows there's a process for me to do anything. I
23	can't do anything just verbal. I have to have a --
24	I have to have a written complaint from -- from
25	Patsy to start anything.

Page 76	
1	<u>Q. Okay.</u>
2	A. That's for every single encounter that
3	somebody's doing wrong. I need a written complaint
4	first because word of mouth means that I can't do
5	anything with that.
6	<u>Q. Okay. But -- but Patsy Jay got an</u>
7	<u>eviction notice for this, right?</u>
8	MS. MANDT: Object to form.
9	THE DEPONENT: No. Patsy Jay got an
10	eviction notice for her caretaker verbally harassing
11	me in my office, alongside the other issues.
12	BY MR. JOHNSON:
13	<u>Q. Okay. Did you follow up on this</u>
14	<u>allegation that the -- that Rebecca is making about</u>
15	<u>John's daily harassment?</u>
16	A. What do you mean follow up on the
17	allegation?
18	<u>Q. Like did you ask her to put it in writing</u>
19	<u>or?</u>
20	A. I asked him to put in written complaints
21	for anything that they need to tell about John.
22	<u>Q. Okay.</u>
23	A. It needs to be a complaint.
24	<u>Q. Okay.</u>
25	A. It needs to be them filing that he did

Page 77	
1	something wrong.
2	<u>Q. Okay. And did you get a report about the</u>
3	<u>finger gun gesture?</u>
4	A. For the finger gun incident? Did I get a
5	report for that? Yes, I did. I'm sure I got a
6	written report, yes.
7	<u>Q. Okay. Do you know if you got other</u>
8	<u>reports from Jay or -- or from Patsy or Rebecca</u>
9	<u>about John harassing her after she'd gotten the</u>
10	<u>restraining order?</u>
11	A. No. No.
12	<u>Q. The next one, I think we've covered August</u>
13	<u>16th. Did -- was it -- was it Mr. McKnight who</u>
14	<u>complained about Patsy Jay and the binoculars?</u>
15	A. Yes. It was -- yes, it was. And then
16	Monte -- Monte Dunn, who was the guy from the other
17	letter had stated that he witnessed Patsy watching
18	John.
19	<u>Q. Okay. Other than Patsy watching John,</u>
20	<u>were there any allegations that she was looking at</u>
21	<u>anybody else with binoculars?</u>
22	A. No. She was only looking at John.
23	<u>Q. Okay.</u>
24	A. Yeah. I didn't get a written complaint
25	regarding anything else.

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78 to 81

<p style="text-align: right;">Page 78</p> <p>1 Q. Okay. This -- and then the next thing is 2 the walker on the front patio. Did you -- you 3 personally saw the walker?</p> <p>4 A. Yes.</p> <p>5 Q. Okay.</p> <p>6 A. Various times.</p> <p>7 Q. And did you take this?</p> <p>8 Let's go ahead and mark this. Oh, that's 9 going to go over here. Sorry. You get the one with 10 the sticker.</p> <p>11 (WHEREUPON, Exhibit 20 was marked for 12 identification.)</p> <p>13 THE DEPONENT: Thank you.</p> <p>14 THE REPORTER: Mm-hmm.</p> <p>15 BY MR. JOHNSON:</p> <p>16 Q. Did you take that picture?</p> <p>17 A. Yes.</p> <p>18 Q. This is the -- why is this a lease 19 violation?</p> <p>20 A. Because the walker is on her patio 21 section, and we cannot have anything that is not up 22 to six live plants or patio furniture. It has to be 23 specifically patio furniture that is allowed on the 24 front porch. It keeps the property more appealing. 25 And then also it's a fire hazard to have extra</p>	<p style="text-align: right;">Page 80</p> <p>1 had knowledge that it wasn't supposed to be there, 2 so she moved it on the other side so it could be 3 more concealed by the giant bush out front, which 4 she knows is still breaking the -- the cure to her 5 conditions.</p> <p>6 Q. So what did you see on August 17th that 7 was different than the preceding days when you -- 8 did you always do a walkthrough of the property 9 every day?</p> <p>10 A. Yes. Every morning.</p> <p>11 Q. Okay.</p> <p>12 A. Yes. This chair was on the other side of 13 her patio.</p> <p>14 Q. And that was not a lease violation?</p> <p>15 A. No, it was. This isn't the first time 16 she's gotten a notice regarding this being outside. 17 So she's aware that she's breaking it and now she's 18 moving it back and forth, which she knows it just 19 shouldn't be outside in the first place. This is 20 her second time, actually, honestly, this would be 21 her fourth time being told about this chair because 22 I have verbally told her twice that this cannot be 23 outside.</p> <p>24 Q. Okay.</p> <p>25 A. Prior to anything with John McKnight.</p>
<p style="text-align: right;">Page 79</p> <p>1 things by your windows and doors in the front of the 2 unit in case like fire department or something 3 needed to access quickly.</p> <p>4 Q. And was this the only day that you saw the 5 walker out there?</p> <p>6 A. No.</p> <p>7 Q. Was it always out there?</p> <p>8 A. The beginning of my employment, yes. It 9 was always outside. And then started trickling down 10 on things. This chair used to be on the other side 11 of her patio.</p> <p>12 Q. Okay.</p> <p>13 A. Over here.</p> <p>14 Q. And you -- but the August 16th --</p> <p>15 A. August 16th pertains to this picture.</p> <p>16 Q. August 17th. Yeah. And that was right 17 after Ms. Jay's caregiver had complained to you 18 about not dealing with the daily harassment?</p> <p>19 MS. MANDT: Object to form.</p> <p>20 THE DEPONENT: No.</p> <p>21 BY MR. JOHNSON:</p> <p>22 Q. But it -- there's just six days apart, 23 right?</p> <p>24 A. Yes, but this like I had said, had been 25 previously on the other side of the yard. So Patsy</p>	<p style="text-align: right;">Page 81</p> <p>1 Q. Did -- after -- after getting this 2 eviction notice, did Ms. Jay ask for a reasonable 3 accommodation for her disability?</p> <p>4 A. For the chair in specific?</p> <p>5 Q. I mean, do you remember any request for 6 reasonable accommodation about this eviction notice?</p> <p>7 A. For the chair -- for the chair.</p> <p>8 Q. For the chair?</p> <p>9 A. Yes.</p> <p>10 Q. And did -- what did you do with that 11 request?</p> <p>12 A. I have to fax that in to my supervisor and 13 then they handle that. They just give me the 14 results and then I print it and post it.</p> <p>15 Q. Do you remember the results?</p> <p>16 A. I do not specifically remember the 17 results, no.</p> <p>18 Q. But it wasn't your job to grant or deny 19 reasonable accommodations?</p> <p>20 A. No, it was not my job to do that.</p> <p>21 Q. Was it Jerry Moscalo's?</p> <p>22 A. It was Dawn's job, but she would have to 23 consult with Jerry.</p> <p>24 Q. Okay.</p> <p>25 A. But it was Dawn -- Dawn Cockrum's job for</p>

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110 to 113

Page 110	Page 112
1 of your deposition that you would text your 2 supervisors about work stuff from your cell phone. 3 Was that like a daily -- is that -- was that one of 4 the main ways you communicated with them? 5 A. Yeah, for like pictures, texting, 6 pictures, "Oh, is this okay?" What's on people's 7 yards.	1 MS. MANDT: Sure. 2 THE REPORTER: Cripps, are you ordering a 3 copy? Are you -- 4 MS. CRIPPS: We'll get the same one. 5 MS. MANDT: Okay. 6 You're done. I'll walk you out. 7 THE REPORTER: We're off record at 11:04 8 a.m.
8 Q. Okay. 9 A. Yeah. 10 Q. And did Jerry text with you? 11 A. Yes, he did. 12 Q. And Dawn? 13 A. No. Dawn, no, no. It was Maria Moldt and 14 Jerry Mascolo -- 15 Q. Okay. 16 A. -- that texted. Yeah. 17 Q. Okay. And so did you text to them about 18 the -- about the Patsy and John incident? 19 A. No. No. It's more of -- it's things that 20 you need a quick response to. Like if somebody has 21 an extra flower pot or a flower pot that just looks 22 a little too big, you'd send a picture, "Hey, is 23 this okay?" Anything that pertains to like -- I 24 don't know, like specific tenant, like their 25 personal stuff or like things about their unit and	9 (WHEREUPON, the deposition of LEONDRA 10 COLEMAN was concluded at 11:04 a.m.) 11 12 13 14 15 16 17 18 19 20 21 22 23 24 25
Page 111	Page 113
1 size -- no, that all has to be done in AppFolio. 2 It's just like for the grounds, like the property 3 wise, like a pipe burst or the lawn's not cut right. 4 Things like that. 5 MR. JOHNSON: Okay. I don't think we have 6 anything further. 7 THE DEPONENT: Yeah, cool beans. 8 MR. JOHNSON: Get on with your Friday. 9 Sorry. I'm sure you would have rather been anywhere 10 else besides here. 11 THE DEPONENT: No worries, guys. I'm 12 sorry we all have to be here. 13 MR. JOHNSON: We can go off the record. 14 You don't have any -- 15 MS. MANDT: Well, hold on. 16 Nate, do you have anything? 17 MR. MCCLINTOCK: No, I do not. 18 MS. MANDT: I have nothing. 19 MR. JOHNSON: Let's go off the record. 20 THE REPORTER: Mr. Johnson, are you 21 ordering the original transcript? 22 MR. JOHNSON: Yeah. 23 THE REPORTER: Okay. 24 Ms. Mandt, are you ordering a copy of the 25 transcript?	1 CERTIFICATE 2 3 I, Rowan Folske, do hereby certify that I 4 reported all proceedings adduced in the foregoing 5 matter and that the foregoing transcript pages 6 constitutes a full, true and accurate record of said 7 proceedings to the best of my ability. 8 9 I further certify that I am neither related to 10 counsel or any party to the proceedings nor have any 11 interest in the outcome of the proceedings. 12 13 IN WITNESS HEREOF, I have hereunto set my hand 14 this 5th day of August, 2024. 15 16  17 18 Rowan Folske 19 20 21 22 23 24 25

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114 to 115

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1 CORRECTION SHEET
2 Deposition of: Leondra Coleman Date: 07/19/2024
3 Regarding: PATSY JAY vs GRAND MANAGEMENT SERVICES
4 Reporter: Rowan Folske

5 _____
6 Please make all corrections, changes or clarifications
7 to your testimony on this sheet, showing page and line
8 number. If there are no changes, write "none" across
9 the page. Sign this sheet and the line provided.

10 Page Line Reason for Change

11 _____
12 _____
13 _____
14 _____
15 _____
16 _____
17 _____
18 _____
19 _____
20 _____
21 _____
22 _____
23 _____

24 Signature: _____
25 Leondra Coleman

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1 DECLARATION
2 Deposition of: Leondra Coleman Date: 07/19/2024
3 Regarding: PATSY JAY vs GRAND MANAGEMENT SERVICES
4 Reporter: Rowan Folske

5 _____
6
7 I declare under penalty of perjury the following to be
8 true:
9

10 I have read my deposition and the same is true and
11 accurate save and except for any corrections as made
12 by me on the Correction Sheet herein.

13
14 Signed at _____, _____
15 on the _____ day of _____, 20_____.
16
17
18
19
20
21
22
23

24 Signature: _____
25 Leondra Coleman

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EXHIBIT B - Page 13 of 13